

Hunters Point Naval Shipyard Superfund Site
Discussion with Robert Edmonson and staff from other congressional offices
Internal Talking Points | Briefing: Monday, December 7, 2020

Background:

This conversation is a follow-up from an update email we sent to the interested congressional offices. Last November, you (Robert) requested EPA keep you up-do-date with letters we send to the Navy and other important site updates. We have tried to accommodate that request. We also recognize this is a frequent stream of information. If you prefer another approach, please let us know.

We also wanted to provide you some additional information to address some of your follow-up questions.

1. Clarification on the ask in our Community involvement letter (August 17, 2020) to the Navy

Edmonson's email: *I get by reading your August letter **you want a RAB reformed**, but is there something beyond that?*

- In our letter, we asked the Navy to take a hard look (comprehensive evaluation) at its current community outreach and involvement program to assess if the Navy is meeting the needs of the community.
- Federal facilities can meet the communication needs of communities in a variety of ways, which could include a RAB.
- However, such a comprehensive evaluation would best inform the most appropriate way for HPNS.
- The Navy responded in November, informing us they will do such an evaluation in 2021.

2. Explanation of the recent public health-related questions about HPNS

Edmonson's email: *I'm not following what the '**recent public health-related questions** about HPNS have been unanswered,' is referring to.*

- There is an ongoing urine screening project in the community, where a local physician is taking urine samples from people and running a "toxicological profile" through a third-party laboratory. She describes the project as a biomonitoring study.
- There have also been community concerns about dust moving off HPNS.
- As a result, there have been a number of local newspaper articles, radio interviews, and presentations at local community meetings which raised public health-question related to HPNS. At the September HPS Citizen's Advisory Committee, we were asked a number of health-related or exposure-related questions.
- We have and will continue to ask the Navy to address the questions and comments from the public.

3. Update on the process to determine the protectiveness of the radiological remediation goals for buildings (the RESRAD vs BPRG debate)

Edmonson's email: *In the meantime, where are we on **resolving the method to test buildings in Parcel G**? Has there been movement on resolving the ResRad vs PRG debate?*

- It's important to acknowledge the Navy has been in the field since August for the soil retesting work in Parcel G. In a recent public meeting with the Shipyard Artists, the Navy communicated the Parcel G *soil* fieldwork will continue through May 2022. This would be followed by data analysis and final decisions. It's likely this soil retesting work on Parcel G would not complete until 2023.
- Still, we need to work with the Navy to ensure the buildings will be safe for future residential use. We have yet to find another Superfund cleanup example where potentially radiologically-contaminated buildings are being cleaned up for residential use. This is a unique scenario and that is one reason why a solution on this topic is taking time.
- Since our [[HYPERLINK "https://semspub.epa.gov/work/09/100021232.pdf"](https://semspub.epa.gov/work/09/100021232.pdf)], letter, we have made good progress with the Navy. In our letter, we outlined three issues.
 - **Proposed response:** We continue to work with the Navy on solutions, while supporting the ongoing Parcel G fieldwork for soil retesting and draft work plans on soil retesting on the other parcels.
 - **More detailed response:** We see possible solutions for two of those issues. The third issue is more complex: it has to do with how the Navy is assessing cancer risk from ingestion of contaminated dust inside the buildings. We are working with the Navy to ensure their approach is protective of human health, engaging our headquarters staff and management.
- **We await the Navy's written response to our August letter.** We do expect there will be a need for additional evaluation on their response. We will work with our headquarters staff and management, as the solution will likely have national policy implications.
- **In the end,** we need the Navy to adequately support their findings that the current building remediation goals are protective of public health under Superfund laws and regulations. The public is counting on all of us to ensure the safety of the future residential reuse of these current onsite buildings.

Questions/Criticisms about the radiological remediation goals for buildings:

- **The buildings decision is creating a longer timeline for retesting:** The final decisions on the Parcel G soil retesting will likely continue into 2023. There is a lot of work ahead of us, including a solution on the buildings. Recently, the Navy has pushed back the date for the draft final work plan on the next parcel to retest. This is a reminder on how large this project is; it is requiring multiple contractors and dozens of federal staff.
- **RESRAD BUILD has been used at other Navy/DOE/DOD cleanups:** We understand the Navy has used RESRAD at many of their cleanup sites. DOD works on many sites that are not cleaned up under the Superfund law. EPA needs to ensure the work at this site follows the protective ethos of the Superfund law, regulations, and policies. We are working with our headquarters team to determine a path forward and gather more information on how RESRAD BUILD has been used for other Superfund sites.
- **EPA and the Navy don't seem to be working together on a solution:** My team has made good progress since August. We have had constructive conversations with the Navy over the past few months. In addition, our federal facilities program has a prescribed dispute resolution process that have proved to be effective in the past. We will continue to work with our headquarters team, and consult with the Navy, to find a solution forward.
- **EPA took too long to respond to the Navy's FYR radiological RGs for buildings evaluation (which was issued in October 2019):** There were significant gaps in the Navy's evaluation. My team needed to bring in subject matter expertise to address those gaps. In addition, we were prioritizing moving the soil fieldwork forward. In the last year, my team worked with the Navy on appropriate soil background values to use at the site, approved the soil retesting work to begin, developed an oversight plan on that work, and did this additional analysis to respond to the Navy's buildings evaluation.
- **EPA's BPRG Calculator is too conservative; it's providing lower than background or are technically unattainable:** Similar to the soil work, we don't expect the Navy to cleanup beyond background values. We also believe there are approaches for the Navy to meet low detection limits. There are also other ways to address technical infeasibility, and we can work toward a solution if that is determined to be the problem. The Superfund law and regulations provide EPA with a blueprint to be protective of human health. We are working with our headquarters team to determine a path forward on whether we can use the numbers coming out of RESRAD BUILD.
- **If the Navy is cleaning the surfaces, why do we need to test for dust?** We need to ensure the buildings can be safe for a residential reuse scenario. At the end of the day, we will likely need to do some sampling to have that assurance.